

Attachment E



Air Pollution Control District
San Luis Obispo County



October 13, 2015

John McKenzie
County Planning & Building Department
County Government Center, Room 310
San Luis Obispo CA 93408

SUBJECT: APCD Comments Regarding the P66 Pipeline Maintenance Project Referral
(DRC2015-00044)

Dear Mr. McKenzie,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed pipeline maintenance and abandonment project located between the Guadalupe Oil Field and the Phillips 66 Santa Maria Refinery. The project will include maintenance of Phillips 66 Company Line 354 Family of pipelines through a process of exposing the buried pipelines, cleaning, and inerting the pipeline with nitrogen gas.

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

Construction Phase Emissions

The construction phase impacts will likely be less than the APCD's significance threshold values identified in Table 2-1 of the CEQA Air Quality Handbook (available at the APCD web site: www.slocleanair.org). **Therefore, with the exception of the requirements below, the APCD is not requiring other construction phase mitigation measures for this project.**

Hydrocarbon Contaminated Soil

Should hydrocarbon contaminated soil be encountered during construction activities, the APCD must be notified as soon as possible and no later than 48 hours after affected material is discovered to determine if an APCD Permit will be required. In addition, the following measures shall be implemented immediately after contaminated soil is discovered:

- Covers on storage piles shall be maintained in place at all times in areas not actively involved in soil addition or removal;
- Contaminated soil shall be covered with at least six inches of packed uncontaminated soil or

other TPH –non-permeable barrier such as plastic tarp. No headspace shall be allowed where vapors could accumulate;

- Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted;
- The air quality impacts from the excavation and haul trips associated with removing the contaminated soil must be evaluated and mitigated if total emissions exceed the APCD's construction phase thresholds;
- During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance; and,
- Clean soil must be segregated from contaminated soil.

The notification and permitting determination requirements shall be directed to the APCD Engineering Division at 781-5912.

Pipeline Purging Plan

The applicant must submit a Pipeline Purging Plan and permit application to the District. If the Pipeline Purging Plan includes the use of District permitted degassing systems, the District may issue a permit exemption for the project. A permit or permit exemption must be issued by the District prior to the start of any pipeline degassing and/or removal activities. Please allow 6 weeks for the permit processing. Information and downloadable application forms are available under the Business Assistance section of our website at www.slocleanair.org. For more information on these requirements, contact the APCD Engineering Division at 781-5912.

All pipeline purging operations shall be conducted in accordance with the following District pipeline purging policy.

1. Petroleum material transportation pipelines shall not be purged or degassed without prior APCO approval.
2. The operator shall submit a Pipeline Purging Plan, designed to minimize nuisance odors, at least thirty (30) calendar days prior to the purging of any petroleum material transportation pipeline. That plan shall:
 - a. Include pipeline internal diameter, designation, material normally conveyed, a large scale map of the upstream and downstream locations between which the purge is to occur, the distance in feet between those two points, and a small scale map of the pipeline's route;
 - b. Address all phases of the process including the estimated length of time over which the purge will occur, the starting date and time, and the method of odor control;
 - c. The location, size, anticipated length of stay, and Rule 425, Petroleum Storage Tanks, compliance status of any temporary storage vessels;
 - d. The location, anticipated length of operation, and the following operating parameters for any odor or emission control device:
 - 1) thermal oxidizers: flow rate of pipeline vapors to the control equipment, control efficiency and capacity, operating temperature, auxiliary fuel

- requirements and consumption rate, expected operating characteristics, and auxiliary equipment requirements, e.g. motor- generators;
- 2) Carbon absorbers: flow rate of pipeline vapors to the control equipment, control efficiency and capacity, breakthrough detection method, and actions to be taken upon breakthrough discovery.
 3. An estimate of the composition of the pipeline vapors to include hydrogen sulfide, benzene, and total petroleum hydrocarbon in volume percent or ppmv; and
 - a. Include emission estimates for all phases of work and equipment involved, with the exception of engines used for welders or air compressors, or as the motive power for mobile equipment.
 4. Multiple or sequential pipeline purges that will occur within a single, ninety (90) day period may be consolidated into the same plan. The APCO reserves the right to require a permit or portable equipment registration for any equipment proposed for use in the pipeline purging if that equipment is not exempt under District Rule 201, Equipment Not Requiring a Permit.
 5. After the initial submittal of a Pipeline Purging Plan, any changes to that plan must be submitted as soon as possible to the APCO. Any change submitted with a lead-time of less than one (1) working day may result in disapproval for the lack of time available to assess the effects of the change.

The APCO shall be notified no later than two (2) working days prior to any pipeline purging event.

Permits

On page 5 of the project description, the following statement is made

"Prior to the evacuation of any fluids or vapors and pipeline purging activities, vapor samples will be analyzed to assess VOC concentrations and composition and the applicable emission control devices will be implemented as require by the San Luis Obispo Air Pollution Control District Permit to Operate (Permit #1945-1)."

Permit 1945-1 needs to be revised to include this project and any specific equipment which might be utilized on this project. Permit 1945-1 was issued for a specific project area and did not include this section of pipelines. To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;
- Rock and pavement crushing;
- Unconfined abrasive blasting operations;
- Tub grinders;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Demolition/Asbestos

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, abatement, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing buildings or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). If this project will include any of these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP). These requirements include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 and also go to <http://slcleanair.org/business/asbestos.php> for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of: <http://slcleanair.org/business/onlineforms.php>.

Developmental Burning

Effective February 25, 2000, **the APCD prohibited developmental burning of vegetative material within San Luis Obispo County.** If you have any questions regarding these requirements, contact the APCD Enforcement Division at 781-5912.

Construction Phase Idling Limitations

If any of the project areas are located in close proximity to sensitive receptors, then the following measures should be implemented.

California Diesel Idling Regulations

- a. ***On-road diesel vehicles*** shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

1. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.
- b. **Off-road diesel equipment** shall comply with the 5 minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation.
- c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5 minute idling limit.
- d. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

In addition to the State required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:

- a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
- b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
- c. Use of alternative fueled equipment is recommended; and
- d. Signs that specify the no idling areas must be posted and enforced at the site.

Other Comments

On page 4 of the project description the following statement is made:

"In addition to work conducted on the GRP site and Teixeira Farms, similar pipeline maintenance activities will be conducted on the USFWS Guadalupe-Nipomo National Wildlife Refuge as part of the pipeline maintenance project. However, the work locations on the Refuge are under the jurisdiction of the USFWS and will not be a part of this land use entitlement and are not discussion the report"

It should be noted the project proponent will be required to comply with all APCD requirements outlined in this letter regardless of who has jurisdiction over the land.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Melissa Guise
Air Quality Specialist

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cc: Louis Mosconi, Phillips 66, Long Beach California